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STATE OF NEW JERSEY  
OFFICE OF THE ATTORNEY GENERAL  
DIVISION OF GAMING ENFORCEMENT  
DOCKET NO. 11-1236-EL

STATE OF NEW JERSEY, DEPARTMENT	)	
OF LAW AND PUBLIC SAFETY,	)	
DIVISION OF GAMING ENFORCEMENT,	)	
	)	
Petitioner,	)	Civil Action
	)	
v.	)	AMENDED PETITION
	)	FOR PLACEMENT ON
FRANKLIN D. JOHNSON, a/k/a	)	EXCLUSION LIST
OMAR F. JOHNSON,	)	
	)	
Respondent.	)	
	)	

Petitioner, State of New Jersey, Department of Law and Public Safety, Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic City, New Jersey, 08401 says:

1. Respondent, FRANKLIN D. JOHNSON, a/k/a OMAR F. JOHNSON ("Johnson"), is a New York resident, residing at [REDACTED], Queens, New York 11434.

2. N.J.A.C. 13:69G-1.3(a)4 authorizes the exclusion of any person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein, including:

\* \* \* \*

iii Persons who pose a threat to the safety of the patrons or employees of a casino licensee;

iv. Persons with a documented history of conduct involving the undue disruption of the gaming operations of casino licensees; ...

\* \* \* \*

3. Between May 1995 and March 2010 Johnson was arrested and convicted 22 times for the following offenses: Defiant Trespasser (18 occasions), N.J.S.A. 2C:18-3b; Attempting to Cause Purposely/Knowingly Bodily Injury to Another (2 occasions), N.J.S.A. 2C:12-1a; Theft by Unlawful Taking (1 occasion), N.J.S.A. 2C:20-3a; and Swindling and Cheating (1 occasion), N.J.S.A. 5:12-113b. All of the matters set forth in this paragraph occurred within licensed casino facilities in Atlantic City and all were adjudicated before the Atlantic City Municipal Court.

4. On July 22, 2009, the Honorable Robert Neustadter, J.S.C. entered an Order barring Johnson from Trump Plaza Hotel and Casino, Trump Taj Mahal Hotel and Casino, Trump Marina Hotel and Casino, Bally's Hotel and Casino, Showboat Hotel and Casino, and Resorts Hotel and Casino until further order of the Court. On January 15, 2010, the Honorable Bruce F. Weekes, P.J.M.C. entered an Order barring Johnson from Borgata for a period of two years. ~.

5. Since the Orders set forth in paragraph 4 were entered Johnson was present in several of the Atlantic City casino facilities recited therein including Trump Plaza Hotel and Casino, Bally's Hotel and Casino, and Resorts Hotel and Casino, and thereby violated the terms of his debarments.

6. Between July 2010 and June 2011 Johnson was arrested at least eight (8) times for Defiant Trespasser, N.J.S.A. 2C:18-3b, and once for Contempt, N.J.S.A. 2C:29-9a. All of the matters set forth in this paragraph occurred within licensed casino facilities in Atlantic City and remain pending before the Atlantic City Municipal Court.

7. In addition to those arrests which resulted in convictions set forth in Paragraph 3 and the pending matters set forth in Paragraph 6, since October 2011 Johnson was arrested on at least six (6) occasions and charged with Defiant Trespasser in violation of N.J.S.A. 2C:18-3b, the most recent of which was on April 8, 2012. Further, in connection with an arrest on November 29, 2011, Johnson was also charged with the offense of Simple Assault, in violation of N.J.S.A. 2C:12-1a, stemming from an altercation with a security officer at Caesars Hotel and Casino. All of the additional matters set forth in this paragraph occurred within licensed casino facilities in Atlantic City and remain pending before the Atlantic City Municipal Court.

8. Based on information contained in Paragraphs 1 through 7 of this Petition, Johnson is a person whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey or licensed gaming therein and should be excluded from casino premises pursuant to N.J.A.C.13:69G-1.3(a)4.

WHEREFORE, Petitioner demands the following relief against Respondent:

A. Judgment that Respondent, Franklin D. Johnson, a/k/a Omar F. Johnson, is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C. 13:69G-1.3(a)4;


B. Judgment entering a final order placing Respondent, Franklin D. Johnson, a/k/a Omar F. Johnson, on the exclusion list pursuant to N.J.S.A. 5:12-71 and N.J.A.C. 13:69G-1.3(a)4; and

C. Judgment for such other and further relief as the Director may deem just and appropriate under the circumstances.

Respectfully submitted,

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Attorney General of New Jersey

By: \_\_\_\_\_

  
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Dated: April 17, 2012